

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

PASTOR BENJAMIN A. JOHNSON, DR.
RONALD A. LUNDEEN, and PASTOR
ARTHUR F. HAIMERL on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

EVANGELICAL LUTHERAN CHURCH
IN AMERICA AND THE BOARD OF
PENSIONS OF THE EVANGELICAL
LUTHERAN CHURCH IN AMERICA,

Defendants.

Court File No. 11-cv-00023 (MJD-LIB)

**DECLARATION OF ALISON B.
WILLARD IN SUPPORT OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT**

I, Alison B. Willard, declare as follows:

1. I am an associate with the law firm of Morgan, Lewis & Bockius LLP ("Morgan Lewis"), attorneys for defendant Board of Pensions of the Evangelical Lutheran Church in America (the "Board"). In my capacity as an associate with responsibility for managing the defense of this litigation, I have personal knowledge of the factual information stated in this declaration.

2. Attached as Exhibit 1 are excerpts from the transcript of the December 7, 2012 deposition of David G. Adams, as received by Morgan Lewis from the court reporting service in attendance at that deposition.

3. Attached as Exhibit 2 are excerpts from the transcript of the December 20, 2012 deposition of Robert Rydland, as received by Morgan Lewis from the court reporting service in attendance at that deposition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 21st day of June 2013, in San Francisco, California.

s/ Alison B. Willard
Alison B. Willard